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Attorney for Defendant

Armando Chavez-Chavez

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE VENUE

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ARMANDO CHAVEZ-CHAVEZ,

Defendant.

Case No.: CR 11-00285 EJD

**STIPULATION AND [PROPOSED] ORDER  
TO CONTINUE SENTENCING HEARING**

The parties by and through their counsel of record, hereby stipulate to the following: The parties have jointly agreed that the current sentencing hearing date of Monday, May 21, 2012 at 1:30 p.m. be continued until Monday, July 2, 2012 at 1:30 p.m. The reason for this continuance is that defense counsel has recently encountered a vehicle burglary in which the suspect took his calendar, briefcase and i-phone. This burglary caused defense counsel to have to rebuild and reconstruct various matters and consequently he has not had an opportunity to see his client or prepare objections to the presentence report. Defense counsel requires additional time to see his client and prepare objections to the presentence report. Karen Mar, Probation Officer has been notified of this request and has no objections to the continuance.

For the factual reason above, the parties agree that the sentencing hearing currently scheduled for May 21, 2012 be continued to July 2, 2012.

1 Date: May 10, 2012

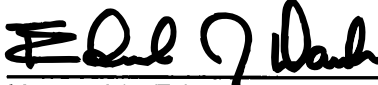
2  
3 /s/Robert W. Lyons  
4 Robert W. Lyons  
Attorney for Armando Chavez-Chavez

5 Date:

6 /s/Carolyn Sanin  
Carolyn Sanin  
Assistant United States Attorney

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9 **IT IS SO ORDERED.**

10 Date: May 10, 2012

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Honorable Edward J. Davila  
United States District Judge